

NRC INSPECTION MANUAL

PART 9900: TECHNICAL GUIDANCE

STS6528.TG

STANDARD TECHNICAL SPECIFICATIONS SECTION 6.5.2.8 - REQUIREMENTS FOR OFF-SITE COMMITTEE AUDIT FUNCTIONS

A. PURPOSE

The purpose of this interpretation is to resolve differences in TS requirements for audit functions performed under the cognizance of the Company Nuclear Review and Audit Group (CNRAG) as defined in STS and plant specific TS.

B. DISCUSSION

Some plant specific TS state that audits shall be performed under the cognizance of the CNRAG. The TS also state that "the results of all actions taken to correct deficiencies occurring in facility equipment, structures, systems or methods of operation that affect nuclear safety shall be audited at least once per six months." The word all is deleted from this requirement in the STS and TS for some newer facilities because of the confusion that has resulted from its use.

Discussions with NRR personnel revealed that NRR has always intended that the CNRAG audit of deficiencies need only include a sample of sufficient size to determine that the corrective action system is functioning and that deficiencies are being corrected on a systematic basis. The discussion also revealed that the STS were revised to clarify this position when NRR learned that some licensees were inferring that a 100% sample was required when the intent was that a sample be drawn from a field that encompassed all actions.

Based on the intent of this requirement and related NRR action as described above, it is acceptable for licensees to use sampling methods for those plant specific TS requirements which either do or do not contain the word "all" for this function.

C. REFERENCE

Memorandum, F. J. Nolan to R. Keimig dated July 24, 1978.

END